



*Via electronic transmittal*

September 13, 2013

Ms. Margaret Wong  
Central Valley Regional Water  
Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

SUBJECT: Administrative Draft Waste Discharge Requirements for Rice  
Growers in the Sacramento Valley

Dear Ms. Wong:

The California Rice Commission (CRC) appreciates the opportunity to comment on the Administrative Draft Waste Discharge Requirements for Rice Growers in the Sacramento Valley (Draft Rice WDR). We also appreciate the opportunity to comment on the Administrative Draft Monitoring and Reporting Program (Draft Rice MRP), and other Administrative Draft attachments. Based on our review of these Administrative Draft documents, the CRC finds it necessary to provide these limited comments for consideration. Further, the CRC reserves its right to comment further on the Tentative Draft documents when such documents are released for public review and comment.

Specifically, the CRC is concerned with the spatial resolution of reporting associated with the Farm Evaluation requirement. Based on the language in the Draft Rice MRP and in the Draft Rice Information Sheet, the CRC understands that an analysis of information received from individual growers would be aggregated and conveyed at a township level, but that along with the township level of analysis all individual data points would also need to be conveyed to the Central Valley Regional Water Quality Control Board (Central Valley Water Board). In other words, all data received by the CRC from individual growers would need to be submitted electronically to the Central Valley Water Board. While the data would not need to be specifically identified by grower name, all raw data would still need to be submitted. The CRC is concerned with this proposed requirement.


Most importantly, the amount of data generated from the grower evaluations will be large and will include thousands upon thousands of individual data points. Considering the large amount of data, the CRC questions the Central Valley Water Board staff's ability to analyze and use this information efficiently and in a meaningful manner. Due to the volume of data and lack of Central Valley Water Board resources, it is likely that such data will "sit" in a database and remain untouched. The CRC does not believe it appropriate to place an administrative burden on the CRC to collect and convey this data when it is likely to not be used meaningfully.

As an alternative to requiring the CRC to submit and convey all data points associated with the Farm Evaluation, the CRC is willing to provide the Central Valley Water Board with additional meaningful analysis of the data upon request. This would mean that in the future, when the Central Valley Water Board staff identifies a specific need and purpose for certain portions of the data, the Central Valley Water Board staff can request the CRC to provide such information as is necessary, in an agreed upon format. In addition, the Central Valley Water Board staff can request the CRC to provide all data points for years in which they are conducting their own analysis. With these approaches, the Central Valley Water Board staff obtains meaningful information rather than massive amounts of raw data annually.

Accordingly, the CRC encourages the Central Valley Water Board to revise the spatial resolution portion of the reporting requirement associated with Farm Evaluations, and only require the information to be aggregated to a township level. With respect to requesting additional analysis of the information at a later date, the Draft Rice WDR already includes specific provisions that provide the Executive Officer with this discretion. However, to the extent that the Central Valley Water Board prefers that such a request be specifically identified in the Draft Rice WDR, the CRC is willing to work with Central Valley Water Board staff to develop appropriate language.

Thank you again for your considerations.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Johnson", is enclosed in a white rectangular box.

Tim Johnson  
President & CEO

